

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

JOSE MONTANEZ,)	
)	
Plaintiff,)	Case No. 17 CV 4560
)	
v.)	Honorable Manish S. Shah
)	
REYNALDO GUEVARA, et al.)	
)	
Defendants.)	

ARMANDO SERRANO,)	
)	
Plaintiff,)	Case No. 17 CV 2869
)	
v.)	Honorable Manish S. Shah
)	
REYNALDO GUEVARA, et al.)	
)	
Defendants.)	

AGREED DISCOVERY PLAN

NOW COME all parties, by their respective counsel, and jointly propose the following discovery schedule:

The parties propose that this Court allow the parties 15 months to conduct all fact discovery.

The parties further propose that expert discovery proceed at the conclusion of fact discovery in the following manner: Plaintiffs are to disclose their experts pursuant to Rule 26(a)(2) within 30 days after the close of fact discovery, to be deposed 30 days after their disclosure; Defendants are to disclose their experts pursuant to Rule 26(a)(2) within 60 days after Plaintiffs' disclosures are due, to be deposed 30 days after their disclosure.

RESPECTFULLY SUBMITTED:

s/ RUSSELLAINSWORTH

Attorney for Jose Montanez

/s/JENNIFER BONJEAN

Attorney for Plaintiff Armando Serrano

/s/JEFFREY N. GIVEN

Attorney for the Individual Defendant Officers

/s/PAULA S. QUIST

Attorney for Defendant Matthew Coghlan

/s/JAMES E. HANLON, JR.

Attorney for Defendants John Dillon and Cook County

/s/EILEEN E. ROSEN

Attorney for the Defendant City of Chicago

CERTIFICATE OF SERVICE

I, Russell Ainsworth, an attorney, certify that on December 29, 2017, I served the foregoing Response to all counsel of record via CM/ECF filing system.

/s/

s/Russell Ainsworth